

# EXHIBIT 16

August 07, 2025

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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IN RE: Uber TECHNOLOGIES,	)	Case No.
INC., PASSENGER SEXUAL ASSAULT	)	3:23-md-03084-CRB
LITIGATION	)	

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\*\*\* HIGHLY CONFIDENTIAL \*\*\*

Volume II

[Wave 1 Plaintiffs' 30(b)(6) Deposition of Uber  
Technologies, Inc, Rasier, LLC, and Rasier-CA, LLC]

HIGHLY CONFIDENTIAL  
UNDER PROTECTIVE ORDER  
VIDEOTAPED DEPOSITION OF HANNAH NILLES

August 7, 2025  
11:17 a.m. Eastern Standard Time

\_\_\_\_\_/

Reported by: Renee J. Ogden, RPR California CSR #14485

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1           sure.

2                   ATTORNEY PETERS: Counsel, that's  
3           another thing we don't have, is any driver's  
4           license showing that he was licensed. In fact, I'm  
5           fairly confident it doesn't exist. If it does, we  
6           want to have it.

7                   ATTORNEY PREMO-HOPKINS: All right.  
8           We'll check on that for you.

9                   ATTORNEY PETERS: Thank you.  
10           Let's go to Tab 7. That will be  
11           Exhibit 1857.

12                   MARKED FOR IDENTIFICATION:  
13                   DEPOSITION EXHIBIT 1857  
14                   Metadata  
15                   2:43 p.m.

16   BY ATTORNEY PETERS:

17   Q. This is a report for Mr. Turay, you can see at the  
18       top?

19                   ATTORNEY PETERS: Let's go to the next  
20       page, please.

21   BY ATTORNEY PETERS:

22   Q. And this is a report, you can see at the bottom,  
23       that was created December 19, 2016, completed  
24       December 22, 2016.

25                   Do you see that?

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1 immigrated in 2013, he would have been way beyond  
2 that anyway.

3 Q. You don't know that he got a driver's license in  
4 2013 or 2014 or 2015, right?

5 A. Presumably no, but going off this motor vehicle  
6 record, which is our source of truth, it says  
7 January 31st, 2008, and I have no reason to  
8 discredit that.

9 Q. Do you think people can get driver's licenses in a  
10 country they have not moved to yet?

11 ATTORNEY PREMO-HOPKINS: Object to form.

12 A. I don't think I was insinuating that, no.

13 BY ATTORNEY PETERS:

14 Q. Have you seen any information to suggest that  
15 Mr. Turay obtained a driver's license any time  
16 between 2013 up until October of 2016?

17 A. I don't remember if I -- which of his driver's  
18 license I've looked at.

19 Q. He first became an active --

20 ATTORNEY PETERS: We can take that down.

21 BY ATTORNEY PETERS:

22 Q. He first became an active driver December 23rd,  
23 2016. Did he remain active after that date?

24 A. Since when, since December 23rd, 2016 -- well, then  
25 he goes through -- over the course of the account's

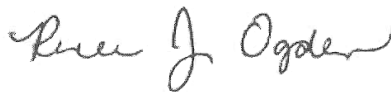
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## 1 REPORTER'S CERTIFICATE

2  
3 I, RENEE J. OGDEN, shorthand reporter  
4 CA CSR No. 14485, do hereby certify that the  
5 witness whose deposition is hereinbefore set  
6 forth was sworn by agreement of all parties,  
7 that the proceedings were reported  
8 stenographically by me, and that this  
9 transcript is a true, correct, and full  
10 record of the testimony given.

11  
12 I further certify that I am not related  
13 to any of the parties to this action by blood  
14 or by marriage, and that I am in no way  
15 interested in the outcome of this matter.

16  
17 IN WITNESS WHEREOF, I have hereunto set  
18 my hand on August 11, 2025.

19  
20  
21  
22   
23

24 Renee J. Ogden, CA CSR No. 14485

25 REPORTER'S CERTIFICATE